

# EXHIBIT C

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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Oracle America, Inc.

v. Case No. 3:10-cv-03561 WHA  
Google Inc.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
Video Deposition of Iain M. Cockburn, Ph.D.  
Friday, February 10, 2012  
Analysis Group  
111 Huntington Avenue - 10th Floor  
Boston, Massachusetts 02199

----- J. Edward Varallo, RMR, CRR -----

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1 I say here for context and to provide a complete  
2 record, then obviously those opinions as I stated in  
3 my September report do rely upon the econometrics.

4 Q. But the particular apportionment analysis  
5 in your February 2012 report does not rely on the  
6 econometric analysis. Correct?

7 A. Neither the group and value approach nor  
8 the independent significance approach rely upon my  
9 econometric analysis.

10 Q. And do either the independent significance  
11 approach or the group and value approach rely on the  
12 results of Dr. Shugan's conjoint analysis?

13 A. Well, they do to some degree, not in the  
14 same way that my September report did.

15 Q. How do the opinions in your February  
16 report rely on the conjoint analysis?

17 A. Well, in particular I looked to the  
18 evidence from the work that Dr. Shugan did with his  
19 conjoint analysis as to the relative value of the  
20 patents, the functionality enabled by the patents in  
21 suit as regards speed or application startup time or  
22 multitasking, versus that value relative to the  
23 value of the copyrights in the APIs.

24 Q. Could you turn to paragraph 423. It's on  
25 page 157.

1 A. Yes.

2 Q. There's a sentence about halfway through  
3 the paragraph that starts with "These  
4 percentages...." Do you see that?

5 A. Yes.

6 Q. And the sentence says "These percentages  
7 are similar to those applied in my September 2011  
8 report but are lower because the independent  
9 significance approach excludes consideration of the  
10 econometric and conjoint analyses." Do you see  
11 that?

12 A. Yes.

13 Q. So is it the case that the conjoint  
14 analysis is used only with respect to the group and  
15 value approach in your February 2012 report and not  
16 the independent significance approach?

17 MR. NORTON: Objection to form. Can you  
18 read the question back, please?

19 THE WITNESS: Yeah. I'm sorry. I'm  
20 trying to pop it out --

21 MR. PURCELL: I can just ask it again.

22 BY MR. PURCELL:

23 Q. So based on that sentence in paragraph  
24 423, is it true that Dr. Shugan's conjoint analysis  
25 is relevant only to the group and value approach in

1 your February 2012 report and not the independent  
2 significance approach?

3 A. A qualitative assessment, if you like, of  
4 the results of Dr. Shugan's conjoint work I think  
5 informs my independent significance approach to some  
6 degree. In the wording of that sentence I am  
7 referring by econometric and conjoint analyses, I am  
8 referring specifically to the use of that work in  
9 defining portions of the incremental sales of,  
10 incremental revenue for Androids which were part of  
11 my September report and which the court has struck.

12 Q. So to what extent is Dr. Shugan's conjoint  
13 analysis used in the independent significance  
14 approach in your February 2012 report?

15 A. Well, I look at the results of that  
16 analysis in a qualitative sense, which demonstrates  
17 to me that the functionality enabled by the patents  
18 in suit or the availability of applications which is  
19 enabled by infringement of the copyrights in the  
20 APIs are sources of value, sources of significant  
21 value to users or purchasers of smartphones.

22 Q. Any other aspect in which the results of  
23 Dr. Shugan's conjoint analysis are relevant to the  
24 independent significance approach in your February  
25 2012 report?

1 We are going off the record. This is the end of  
2 tape 4 and the end of the deposition of Dr. Iain  
3 Cockburn.

4 (Deposition concluded at 3:40 p.m.)  
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14 WITNESS  
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## HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

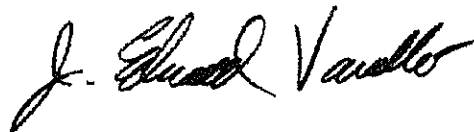
## 1 COURT REPORTER'S CERTIFICATE

2 I, J. Edward Varallo, RMR, CRR, Registered  
3 Professional Reporter and Notary Public in the  
4 Commonwealth of Massachusetts (my commission expires  
5 12/24/2015), hereby certify that the deposition of  
6 Iain M. Cockburn, Ph.D. taken on February 10, 2012,  
7 in the matter of Oracle America, Inc. v. Google Inc.  
8 was recorded by me stenographically and transcribed;  
9 that before being sworn by me, the deponent provided  
10 satisfactory evidence of identification as required  
11 by Executive Order 455 (03-13) of the Governor.

12 I certify that the deposition transcript  
13 produced by me is true and accurate to the best of  
14 my ability.

15 I certify further that I am not counsel,  
16 attorney, or relative of any party litigant, and  
17 have no interest, financial or otherwise, in the  
18 outcome of this suit.

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23  
24 DATED: 2/20/2012



25 J. Edward Varallo